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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THOMAS ISLEY, JEFFERY QUINN, VIPUL  
KHANNA, WALINGTON URENA, DANIEL  
GULICK, and MICHAEL HENCHY JR, on  
behalf of themselves and the putative class,

*Plaintiff,*

v.

BMW OF NORTH AMERICA, LLC and  
BAVARIAN MOTOR WORKS AG,

*Defendants.*

Case No. 2:19-cv-12680-ES-MAH

**STIPULATION AND PROPOSED  
ORDER EXTENDING BMW OF  
NORTH AMERICA, LLC'S TIME TO  
RESPOND TO FIRST AMENDED  
CLASS ACTION COMPLAINT**

**Whereas**, pursuant to the Court's August 2, 2019 Order (D.E. 8) setting the briefing schedule in this matter, BMW of North America's ("BMW NA") Motion to Dismiss is due on or before August 23, 2019

**Whereas**, counsel for BMW NA and counsel for Plaintiffs Thomas Isley, Jeffery Quinn, Vipul Khanna, Walington Urena, Daniel Gulick, and Michael Henchy, Jr., have conferred regarding a brief extension of BMW NA's time to file its motion to dismiss:

Now, therefore, it is hereby stipulated and agreed, by and between the undersigned counsel, as follows:

1. BMW NA will file its Motion to Dismiss on or before August 26, 2019;
2. Plaintiffs will respond to the Motion to Dismiss on or before September 23, 2019;
3. BMW NA will reply in further support of its Motion to Dismiss on or before  
October 7, 2019

/s/ Frederick J. Klorczyk III

Frederick J. Klorczyk III

Joel D. Smith

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*Attorneys for Plaintiffs*

Dated: August 23, 2019

/s/ Melissa J. Bayly

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*BMW of North America, LLC*

Dated: August 23, 2019

## **ORDER**

The above application is **GRANTED** on this \_\_\_\_ day of \_\_\_\_\_, 2019.

1. BMW NA will file its Motion to Dismiss on or before August 26, 2019.

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Hon. Esther Salas, U.S.D.J.

Hon. Michael A. Hammer, U.S.M.J.